

3. I make this affirmation in order to inform the Court of the conditions at Parchman, to further support the Complaint in this matter.

4. The situation at the prison has become a crisis. The inmates are being denied basic human needs, and authorities have not been able to prevent several recent violent murders among the inmates. If this is not corrected as soon as possible, further lives will be lost as a direct result of the dangerous and unhealthy conditions.

THAT'S VERY TRUE

5. Guards have been neglecting and actively abusing the prisoners. In terms of specific misconduct by guards at Parchman, including abuse against inmates directly and other unsafe or improper behavior, I have personally observed the following incidents:

- CO OPENING DOORS OF CELL & LETTING INMATES INTO OTHER CELL TO BEAT UP ANOTHER INMATE, TWO - THREE TIMES, THE CO BOYFRIEND IS AN INMATE
- CO SHOWING FAVORITISM TO INMATE BOY FRIENDS TO LET THEM OUT OF THE CELL
- CO LET # THE FOOD SIT OUT FOR HOURS & WONT SERVE
- CONDUCT ON POST IN THE TOWER BUT IN THE HALLWAY.

6. Parchman is also critically understaffed. To my knowledge, there are currently

5 [REDACTED] correctional officers guarding the unit where I am incarcerated, overseeing 160 inmates.

There are not enough guards to keep prisoners safe, which has made possible the series of killings that have taken place – including the murders by stabbing of Ulysses, [REDACTED] "No G", [REDACTED] Denorris Howell between January 1 and 3, 2020. Because I have observed these and other numerous acts of misconduct and violence between prisoners, as described in this affirmation, I believe that this number of guards is not sufficient to keep inmates reasonably safe.

//

7. I personally fear for my life and safety, because in my experience, the number of guards in my unit is not enough to prevent violence.

8. I have personally observed the following with regard to the lack of correctional officers and other staff here at Parchman:

• HE SAID THAT DENVERIS HOWELL BEGAN OUT BECAUSE
THE GUARDS DID NOT HELP HIM

9. Because of the lack of sufficient security, violence among the inmates is common and the small staff of correctional officers is not able to prevent it. I have personally witnessed or experienced the following violent episodes:

• GUARDS ONLY DO SECURITY CHECKS ONLY [REDACTED] ONCE A TOUR WHICH ARE 12 HOURS, SO IF YOU NEED ASSISTANCE THE GUARDS [REDACTED] ARE NOT AROUND.

• ON WEEKENDS SOMETIMES ONLY 1 GUARD ON DUTY FOR 80 INMATES IN ONE ZONE & THE OTHER ZONE 80.

• ON JANUARY 6, 2020 HE OBSERVED INMATES KILL EACH OTHER & THE GUARDS DELAYED COMING. GUARD PLACED GUN ON [REDACTED]

• [REDACTED] FOOD IS CONTAMINATED AND NOT FIT FOR HUMAN CONSUMPTION. [REDACTED]

• [REDACTED] AND OTHER INMATES HAVE HAD TO EAT FOOD THAT WAS CONTAMINATED BY [REDACTED]
[REDACTED]

3. I make this affirmation in order to inform the Court of the conditions at Parchman, to further support the Complaint in this matter.

4. The situation at the prison has become a crisis. The inmates are being denied basic human needs, and authorities have not been able to prevent several recent violent murders among the inmates. If this is not corrected as soon as possible, further lives will be lost as a direct result of the dangerous and unhealthy conditions.

5. Guards have been neglecting and actively abusing the prisoners. In terms of specific misconduct by guards at Parchman, including abuse against inmates directly and other unsafe or improper behavior, I have personally observed the following incidents:

- I PERSONALLY OBSERVED CO HAVING OVERLIVES TO INMATES DURING THE RIOTS IN THE BEGINNING OF JAN 2020.
- I PERSONALLY OBSERVED CO DURING THE RIOTS NOT RENDER AID TO INMATES WHO WERE STRUCK

6. Parchman is also critically understaffed. To my knowledge, there are currently ²⁹¹ 24 correctional officers guarding the unit where I am incarcerated, overseeing 151 inmates.

There are not enough guards to keep prisoners safe, which has made possible the series of killings that have taken place – including the murders by stabbing of Walter Cutts, Tammie Holloway, Denorris Howell between January 1 and 3, 2020. Because I have observed these and other numerous acts of misconduct and violence between prisoners, as described in this affirmation, I believe that this number of guards is not sufficient to keep inmates reasonably safe.

~~THE GUARDS LEFT DENORRIS HOWELL IN HIS CELL FROM 2:30AM UNTIL NOW [REDACTED]~~
~~[REDACTED] AND NO ONE HELD HIM EVEN THOUGH THEY~~
~~REMOVED HIS [REDACTED] AT 3:00AM~~

CERMAN

CB
AMOS, ET AL P000026

7. I personally fear for my life and safety, because in my experience, the number of guards in my unit is not enough to prevent violence.

8. I have personally observed the following with regard to the lack of correctional officers and other staff here at Parchman:

• SINCE THE RENTS ARE PERSONAL [REDACTED] BECAUSE LIVES WERE REMOVED I HAVE REQUESTED GUARDS FOR CLOTHES SOAP, WATER, TISSUE AT LEAST 6 TIMES.

9. Because of the lack of sufficient security, violence among the inmates is common and the small staff of correctional officers is not able to prevent it. I have personally witnessed or experienced the following violent episodes:

ON TWO DIFFERENT OCCASIONS I OBSERVED
INMATES FIGHTING I REQUESTED GUARDS
FOR ASSISTANCE & THEY DISGARD THE INMATES

10. Food is often contaminated and not fit for human consumption. For example, since MANZANAR, I and other inmates have had to eat food from trays that were tainted by rat and bird excrement.

THE FOOD IS NOT COOKED AND COLD.

CATEGORIES OF CONCERN:

1. UNDERSTAFFING:

Parchman is critically understaffed. To my knowledge, there are currently 1 correctional officers guarding the unit where I am incarcerated, overseeing 152 inmates. I have personally witnessed or experienced the following with regard to the lack of correctional officers and other staff here at Parchman:

Are most guards female? Yes

Safety issues because of understaffing? Yes

Fear for life and safety? Yes

Lack of security and resources leading to violence? No security cameras
on our building work.

Do guards come in Building? Officers are supposed to hand out trays to make sure prisoners get trays. Instead, they let the gang affiliated members do this.

8. Other problems and incidents I have personally observed or experienced (that I want to include at this time) are: (guard issues, abuse, other) The gang members will infiltrate a cell, tie him to a brick, request money from the tied-up inmate's family. The victim's family will call security, and no one answers the phone. The guards have been warned prior if the money doesn't come in, I have witnessed victims being beaten and stabbed.

9. My fellow inmates and I are asking that the federal judge please come to see the conditions in EVERY BUILDING of Unit 29 and talk to the inmates directly. If I could, I would tell the judge the following: Since November, we have made commissary four times. We have been deprived of hygiene. I have not been outside for 9 months. It is not right the way they are treating us. I would swear to this in front of a judge in a Court of law.

The foregoing statements are true and correct to the best of my knowledge, information and belief. I hereby affirm under penalty of perjury as follows:

Jonathan J. Ham

PRINT

Jonathan J. Ham

SIGN

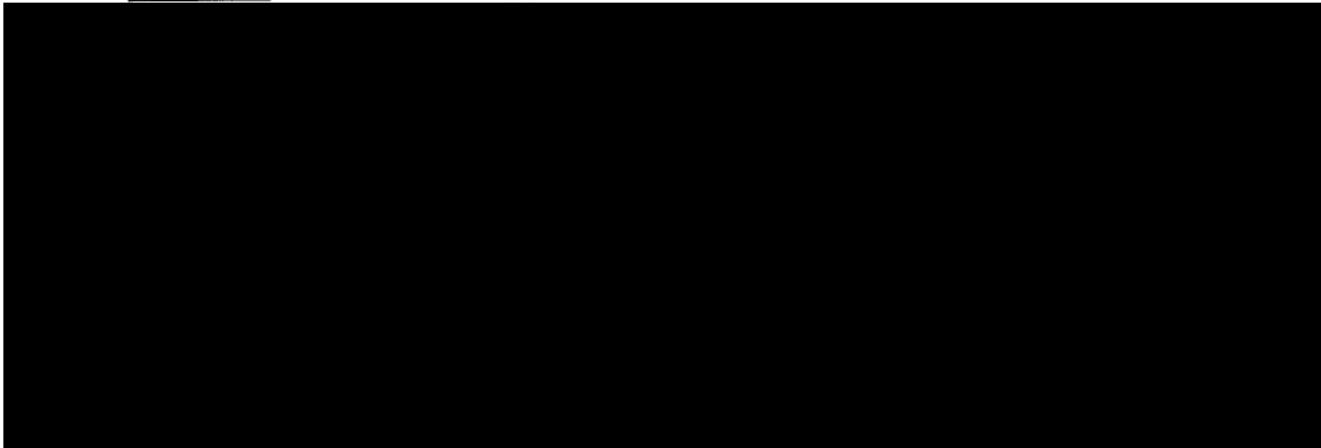
1/29/20

DATE

4:03

TIME

CLIENT INTERVIEW FORM

MDOC NO. 124724FULL NAME: Lemartine TaylorNICKNAME: N/AUNIT: 29 BUILDING: 6 ZONE: A

INTERVIEW NOTES:

1. I have been incarcerated at Parchman since October 2019 and been on lockdown.

2. I was incarcerated in the following Units at the following times:

Unit No.	Building	Zone	Start Date	Transfer Date	Inmates Per Cell
Current	<u>29</u>	<u>6</u>	<u>A</u>	<u>Oct. 2019</u>	
Prior					
Prior					
Prior					

3. The current condition of my cell (include details regarding power, water, mold, rats, sewage, busted plumbing, broken windows, etc.) is:

A couple of weeks ago, no water at all. Roaches are very bad. They have crawled on me. For 1.5 - 2 weeks the toilet did not work and I had to defecate in a plastic bag. Screen on my window so I can't see window - No sunlight. No heat since got here.

L.T.
Initial Here

CATEGORIES OF CONCERN:

1. UNDERSTAFFING:

Parchman is critically understaffed. To my knowledge, there are currently 1 correctional officers guarding the unit where I am incarcerated, overseeing 80 inmates. I have personally witnessed or experienced the following with regard to the lack of correctional officers and other staff here at Parchman:

Are most guards female? Yes

Safety issues because of understaffing? Yes

Fear for life and safety? No

Lack of security and resources leading to violence? They show favoritism

Do guards come in Building? Every once in a while -
After they come in, they don't come back
Over ~~1~~ day, they might come in twice
for a few minutes.

2. FOOD:

Food is often contaminated and not fit for human consumption. I have personally witnessed or experienced the following problems with food (including times when it was late or unfit for consumption):

Food containing (circle all that apply): rat excrement, bird droppings, rocks,

insects, rats, other _____.

Meals Late or Meals skipped entirely? Late - yes - Twice since been here , only eat twice in one day - skipped lunch-

Cold and often spoiled?

Meat products look undercooked & has been sitting out - T-ham.

Inmates bring food in - different inmates do it.

Inmate let out to get cart w/ food . -

Some guys are not given a tray . Some trays are missing things - Leads to fighting.

Food is always cold - have not had a hot meal since I've been here -

3. WATER:

When running water is available at all, it is contaminated. It is brown in color.

Does it have sewage? Possibly

~~I compared it with water, and it doesn't look right. Particles floating in it.~~

Do sinks have water? Today it does.

Toilets? Can it flush? All tied together? Raw sewage on floor?

~~Has been working for about 5 days - Was not working prior to that - Would not flush at all -~~

I have experienced about 14 days during which running water is not available.

Describe.

The last time I was allowed to shower was on Wednesday ^{1/29}. Before that, the last time I was allowed to shower was on Christmas Day.

~~Shower cell started this Monday -
Was running down w/ bottled water given 4 bottles/day.~~

There are no laundry facilities available for inmates. To wash my clothes, I have

to: Only way is since water has been back on -
They don't come around & get dirty laundry.

Anything else? During my incarceration I have personally witnessed or experienced the following additional instances of unsanitary or unhealthy conditions:

Unable to brush teeth & wash face - doesn't feel right doing it the way we have to.

4. RATS, COCKROACHES:

Beds? Food? Cantine? Where? How many? Describe.

Yes | No

Yes - Roaches - If you don't eat when it first comes in, roaches get on it immediately.

5. BLACK MOLD: I have seen black mold in the following places:

Walls in cells? ~~Yes~~

Rain comes through ceiling? - Yes, when it rains hard - come down the wall -

Showers? - On wall & ceiling - Floorsboards when come in -

Sinks? They don't clean the showers - Can catch things
in this -

Others?

Have
to use a
towel or
shirt if I
have one to
stop it.

6. MEDICAL: Some of my current medical needs and problems are: None

Sick Calls? Responses? Missing medicine? Injured inmates?

Nov. 17

Inmate in mid-Nov
stabbed in arm -
Officer saw and left.

— Too scared to take
L When something happens, you have to fill out a form
+ they will call you in 2-3 days - may be gone -

I have experienced or observed the following incidents where prison officials refused to provide medical treatment for inmates:

L A couple of days ago, an inmate fell out + the CO's refused to come in - Took 10-15 minutes - Thought they were playing around - Had passed out earlier that day -

I haven't
paid 6 bucks
to give a
note -

Took
Medic 30-45
minutes +
sat there,
+ the inmate
died -

"Black Nine"
nickname

Fires? To signal guards?

L Yes - Two weeks ago, diabetic inmate - power off, water off - Needed insulin - Finally came after 25 minutes. Whole zone was smoked out - Black stuff in nose.

7. I (circle one) DID or DID NOT personally know the people who have died

at Parchman since in the last few weeks. (Details, if any.)

Black Nine - > Nicknames
Magic

8. Other problems and incidents I have personally observed or experienced (that I want to include at this time) are: (guard issues, abuse, other)

Air vents are full of dust.

9. My fellow inmates and I are asking that the federal judge please come to see the conditions in EVERY BUILDING of Unit 29 and talk to the inmates directly. If I could, I would tell the judge the following:

Its terrible - If staff would come around
every once in a while, it would better - People
have been left hanging in their cells -
We need better living conditions - Brown spots on
the wall - Does not look like the interview area.

The foregoing statements are true and correct to the best of my knowledge, information
and belief. I hereby affirm under penalty of perjury as follows:

Lemartine Taylor
PRINT

Lemartine Taylor
SIGN

1/13/20 12:55
DATE TIME

Digital Recorder Number: 12

Interviewer 1:

Preston Lee
PRINT


SIGN

1/31/20 1:03
DATE TIME

Interviewer 2:

Colleen Welch
PRINT


SIGN

1.31.19 12:10 - 1:00
DATE TIME

witnessed

Brian Suprenant



1/30/2020 _____